

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

**In re:**

**CASE NO.: 19-03614-JAF**

**ANGELO L. WILLIAMS,**

**Debtor.**

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**TRUSTEE'S RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC  
STAY OF CREDITOR, NEW RESIDENTIAL MORTGAGE, LLC**

COMES NOW, Doreen Abbott, Chapter 7 Trustee (the "Trustee"), and hereby responds to the Motion for Relief from Stay of New Residential Mortgage, LLC ("Secured Creditor") (Doc. No. 10), as follows:

1. The Debtor, Angelo L. Williams (the "Debtor") filed a voluntary petition for relief under Chapter 7 of the Bankruptcy Code on September 24, 2019 (Doc. No. 1).
2. On his Amended Schedule A/B (Doc. No. 11), the Debtor listed an interest in the real property located at 1021 Gardenbridge Place, Saint Charles, Missouri 63303 (the "Property").
3. The Debtor did not claim any exemptions in or to the Property on his Schedule C.
4. On October 22, 2019, Secured Creditor filed its Motion for Relief from Stay as to its interest in the Property (Doc. No. 10).
5. The Trustee objects to the relief sought in the Motion on the grounds and to the extent that the Trustee needs additional time to investigate whether there is equity in the Property, or if not, whether there may be an opportunity to sell the property with the consent of the lienholder in return for a carve-out to the estate.

WHEREFORE, the Trustee respectfully requests that the Court enter an Order (i) denying Secured Creditor's Motion; and (ii) granting the Trustee any other relief to which she may be entitled.

Respectfully submitted,

**JOHNSON LAW FIRM, P.A.**

/s/ Eugene H. Johnson  
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*Attorneys for Doreen Abbott,  
Chapter 7 Trustee*

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a true and accurate copy of the foregoing was served this 12th day of November, 2019 by U.S. Mail to Angelo L. Williams, 7777 Normandy Boulevard, Apartment 814, Jacksonville, Florida 32221, and by CM/ECF electronic notice to Keith D. Collier, Esq., *Counsel for the Debtor*, and Ida A. Moghimi-Kian, Esq., *Counsel for Secured Creditor*.

/s/ Eugene H. Johnson  
Eugene H. Johnson, Esq.